

Appendix F
Infringement of U.S. Patent No. 11,501,607 (“607 Patent”) By Accused Products¹
Milestone Entertainment, LLC’s Infringement Contentions

Milestone Entertainment, LLC (“Milestone”) contends that Activision Blizzard, Inc. (“Activision”) infringes at least the following claims of the U.S. Patent No. 11,501,607: 1, 2, 4, 6, 7, 11, 15, and 19.

Activision directly infringes at least claims 1, 2, 4, 6, 7, 11, 15, and 19 under 35 U.S.C. § 271(a), as set forth in Milestone’s Infringement Contentions.

Activision induces direct infringement of at least claims 1, 2, 4, 6, 7, 11, 15, and 19 under 35 U.S.C. § 271(b), as set forth in Milestone’s Infringement Contentions.

The following claim chart containing exemplary disclosures is based on the information presently available to Milestone. Milestone’s investigation of the case continues, and Milestone reserves the right to supplement this claim chart as appropriate.

¹ The “Accused Products are Defendant’s “Candy Crush” casual games, including “Candy Crush Saga,” “Candy Crush Friends Saga,” “Candy Crush Jelly Saga,” and “Candy Crush Soda Saga”. Milestone’s contentions concerning Candy Crush Saga are representative of infringement by all Candy Crush Accused Products, because each utilizes variable parameters to modify game odds or prizing so as to achieve a set of mandated parameters, and utilizes virtual currencies in a manner not different from Candy Crush Saga for purposes of infringement.

Claim Language	Infringement Evidence
1. A system for electronic game play involving one or more remote users of a system in an electronic environment, the remote users utilizing electronic communication devices having display capabilities, the electronic communication devices having input capability and generate an output corresponding to the input, the electronic communication devices having storage to store information from a remote source, comprising:	Even if the preamble is limiting, it is met by the Accused Products for the reasons stated in connection with the 279 Patent, Claim 1 (Appendix A). Specifically, the Accused Products are played by remote users on electronic communication devices including Android and iOS mobile phones and tablets, each of which have input and output capabilities, including graphical displays, and which interact with servers at a different location over a communications network that are owned or operated by Defendants.
1(a) a server including memory to process and store:	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(a) (Appendix A).
1(a)(i) registration user information of the remote users,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(d) (Appendix A).
1(a)(ii) game play information regarding particular game play events,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(c) (Appendix A).
1(a)(iii) payment information of the remote users, and	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(c) (Appendix C).
1(a)(iv) mandated and variable parameters for use in the course of game play, wherein the mandated parameters represent parameters which must be achieved by the system as a whole, and the variable parameters represent parameters characterizing at least one of: a game structure and a prizing	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitations 1(a), 1(b) (Appendix A).

Claim Language	Infringement Evidence
structure,	
1(b) a communication interface adapted to couple bi-directional communications between the one or more remote users utilizing electronic communication devices,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(b) (Appendix A).
1(c) a game processor coupled to memory generating game play information, the game processor providing at least:	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(c) (Appendix A).
1(c)(i) the game play information including game play with virtual money (vCoins), the virtual money (vCoins) being acquired in response to a purchase utilizing the payment information of the users,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitations 1(g), 1(h) (Appendix C).
1(c)(ii) the virtual money (vCoins) acquired in response to a purchase being subject to a multiplier,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(i) (Appendix C).
1(c)(iii) implementing a first variable parameters to provide a first game play experience, and	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(f) (Appendix A).
1(c)(iv) modifying the variable parameters to provide second variable parameters providing a second game play experience, where the first game play experience differs from the second game play experience,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(g) (Appendix A).

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1(d) memory storing account information which varies through game play,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitation 1(e) (Appendix A).
1(e) a decision engine for performing game analytics on the game play and determine the selection of the first or second programmable variable parameters utilizing the recorded game play information with predefined criteria, and	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitations 1(i)-1(j), (Appendix A).
1(f) a prize system to award a win to the one or more remote users determined by a prize structure.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(n) (Appendix C).
2. The system for electronic game play involving one or more remote users of a system in an electronic environment of claim 1 wherein the predefined criteria includes game structure.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitations 1(i)-1(j), (Appendix A).
4. The system for electronic game play involving one or more remote users of a system in an electronic environment of claim 1 wherein the server further includes player's club information.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(d) (Appendix C).
6. The system for electronic game play of claim 4 wherein the player's club information includes information on non-cash amounts.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(d) (Appendix C).
7. The system for electronic game play of claim 1 wherein the first and second variable parameters utilize game play information across multiple users devices.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, Claim 5 (Appendix A).

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11. The system for electronic game play of claim 1 wherein the game play information includes information tracking the users play.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, Claim 13 (Appendix A).
15. The system for electronic game play of claim 1 wherein the prizing structure is modified by modifying awarding of non-cash prizes.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, Claim 18 (Appendix A).
19. The system for electronic game play of claim 1 wherein the decision engine for game analytics tracks user specific play.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, Claim 23 (Appendix A).